

June 2012

New Medicaid Requirements for Ordering, Prescribing, and Referring Provider FAQ

Effective for dates of service on and after July 1, 2012, the Medicaid Program of the Health Care Authority (the Agency) will require any ordering, referring, or prescribing providers to enroll as participating providers with Medicaid. Medicaid cannot pay for any health care service requiring a referral, order, or prescription from a physician or other licensed health care professional unless the provider is enrolled in the Agency's ProviderOne claims adjudication system.

Q. Why is Washington Medicaid requiring these providers to become enrolled?

A. Washington Medicaid is complying with federal regulation 42 CFR 455.410, regarding the enrollment and screening of providers.

Q. How does the ordering, referring, or prescribing provider enroll as a Washington Medicaid provider?

A. Washington Medicaid has an online enrollment process. If the provider is an individual practice provider, he or she enrolls his- or herself. If the provider works for a clinic or group practice (we call this provider the servicing provider), then the clinic or group practice enrollment staff completes the enrollment process. If the provider is a pharmacist, he or she must be enrolled as an employee of a least one participating pharmacy. Complete enrollment information can be found at the Medicaid Provider Enrollment web page at <http://hrs.a.dshs.wa.gov/ProviderEnroll/enroll.shtml#provider>.

Q. What if the provider needs a National Provider Identifier (NPI) number?

A. The federal government issues NPIs for health care providers at website <https://nppes.cms.hhs.gov/NPPES/Welcome.do>.

Q. How will providers report the ordering, referring, or prescribing provider for a billed service?

A. Washington Medicaid is requiring all claims for items and services that were ordered, prescribed, or referred to contain the NPI of the licensed health care professional ordering, prescribing or referring the service in a designated field. If you are unsure where to enter the NPI on the claim form, review the [ProviderOne Billing and Resource Guide](#) for more information. For pharmacy claims information see the [Prescription Drug Program](#) provider guide.

Q. What if the provider is enrolled with another state's Medicaid? Will the provider need to enroll in all states in which he or she provides service?

A. Enrollment in another state's Medicaid program does not exempt a provider from becoming a Washington Medicaid provider. Providers are required to enroll in each state where they provide service.

Q. If Washington Medicaid is secondary to a commercial insurance would the claim be accepted without an enrolled ordering, prescribing, or referring provider requirement?

A. No, the enrollment requirement also applies if the Agency is being billed as the secondary to a commercial insurance.

Q. Do Medicare crossover claims then require the ordering, prescribing, or referring provider to be enrolled?

A. No, Medicare crossover claims are exempt from the enrollment requirement. However, the Agency recommends these providers enroll as Medicaid providers.

Q. Our hospital is a teaching hospital so how do we report a "resident physician"?

A. To comply with the requirement one of the following must occur:

- Claims may be submitted using the NPI of the supervising physician for any services ordered, prescribed, or referred by a "resident physician",
- The hospital must enroll the resident as a performing provider under the NPI of a group or hospital with an active Core Provider Agreement with the Agency,

- Prescriptions for scheduled drugs requiring a DEA number must be submitted using the NPI of a supervising physician, or
- The hospital may contact the Agency for additional options to enroll residents.

Q. How do we know the NPI of the licensed health care provider who wrote the prescription or order?

A. Any prescribing physician or licensed health care provider must include his or her NPI on any prescription/order he or she writes, to allow the provider filling the prescription/order to prepare the claim.

Q. I have the provider's NPI but how can I tell if he or she is enrolled with Washington Medicaid?

A. The provider filling the prescription or providing services and then billing can utilize ProviderOne to conduct a "Provider Inquiry" to ensure any health care professional is enrolled with the Agency as a Medicaid provider. If your inquiry finds the provider in ProviderOne, then he or she is an active Medicaid provider.

For retail pharmacies filling a prescription for medication, simply bill the claim using your Point of Sale system with the NPI of the prescriber. If the prescriber is not enrolled with Medicaid, you will receive a claim rejection that informs you of the prescriber's status.

Q. Does a provider have to be enrolled as a participating provider or can he or she be enrolled only as an ordering, prescribing, or referring provider?

A. Yes, any enrolled provider who is ordering, prescribing, or referring services would have to be seeing the client and is therefore automatically a participating provider and is considered such. While providers do have the right to limit the number of Medicaid clients they serve, they are subject to all Medicaid rules.

Q. Does Washington Medicaid have a list of CPT codes that require an ordering, prescribing, or referring provider?

A. No, Medicaid does not have a list of codes that require a ordering, prescribing, or referring provider. Services including consultations, therapies, lab and X-ray, pharmacy, inpatient hospital services, or specialty care, etc. may require an ordering, prescribing, or referring provider.

Q. Do the managed care organizations (MCO) claims have to follow this requirement?

A. No, claims submitted to the Agency's managed care organizations are specifically exempted from this requirement.

Q. If the ordering, prescribing, or referring provider is not enrolled in Washington Medicaid, when will the claim denials start?

A. Denials for claims submitted without an enrolled ordering, prescribing, or referring provider will start with claims submitted for dates of service on and after July 1, 2012.

Q. Is Washington Medicaid following the CMS policy on the types of providers that can refer?

A. Yes, Washington Medicaid is complying with federal regulation 42CFR 455.410 and following those guidelines.

Q. Does Washington Medicaid have a list of types of providers that can refer?

A. No, Medicaid does not have a list of types of providers who can order, prescribe or refer. Washington follows industry standards if ordering, prescribing, or referring is within the scope of the healthcare provider's licensure of the enrolled provider as defined by the Department of Health.